

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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United States of America, ex rel., et al.,

Case No. 13-cv-3003 (WMW/DTS)

Plaintiffs,

**FIRST DISCOVERY ORDER**

v.

Cameron-Ehlen Group, Inc., et al.,

Defendants.

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The above-captioned matter came before the court on issues relating to review and production of email documents from several custodians who are employees of the Defendant. The Court, having heard argument on the matter and being fully apprised hereby makes the following order regarding e-discovery in this matter: **IT IS HEREBY ORDERED:**

1. The following search terms shall be run for all document custodians identified by the United States for the period up to and including 2015. Defendant shall review and produce all relevant documents identified through this search:

- a. AKS
- b. Criminal
- c. Crime
- d. "fair market value"
- e. "FMV"
- f. "Return on investment"
- g. "ROI"
- h. Illegal

- i. Kickback
- j. Antikickback
- k. OIG

To the extent that Defendants have already run such searches and produced the documents identified through those searches they need not re-run the searches.

2. The following search terms/Boolean searches shall be run for the same custodians for the same period. Once the HITs have been determined based on these searches the Defendant can either (1) review and produce the documents identified; (2) negotiate a resolution with the United States regarding review and production or (3) raise the issue at the next scheduled status conference:

- a. "Beaver Creek" w/25 Dr. or doc\* or (last name)
  - b. "Rolling Green" or "RGE" w/25 Dr. or doc\* or (last name)
  - c. "stock Farm" w/25 Dr. or doc\* or (last name)
  - d. "white lake" w/25 Dr. or doc\* or ( last name)
  - e. Gunisao w/25 Dr. doc\* or (last name)
  - f. "The Masters" w/25 Dr. or doc\* or (last name)
  - g. "Big Narrows" w/25 Dr. or doc\* or (last name)
  - h. Niska w/25 Dr. or doc\* or (last name)
  - i. Nueltin w/25 Dr. or doc\* or (last name)
  - j. Steichen w/25 Dr. or doc\* or (last name)
  - k. Sutton w/25 Dr. or doc\* or (last name)
  - l. "Convert\*" w/10 Dr. or doc\* or (last name) or (clinic name)
  - m. Duck or fish\* or goose or pheasant or hunt\* w/10 trip or vacation or excursion or expedition or boondoggle or hunt\* w/20 Dr. doc\* or (last name)
- [NOTE – IT IS THE COURT’S INTENTION THAT EACH INDIVIDUAL WORD IN THE FIRST SERIES BE RUN AGAINST ALL WORDS IN THE SECOND SERIES AND ALL WORDS IN THE THIRD SERIES – FOR EXAMPLE – DUCK W/10 TRIP OR VACATION OR EXCURSION OR**

**EXPEDITION OR BOONDOGGLE OR HUNT\* W/20 DR. OR DOC\* OR  
(LAST NAME)**

- n. Hotel or “frequent flyer” or Skymiles or miles or lodg\* or Manny\* or golf or tournament or invoice or reward or Parasole or quid or Tiff\* or Vikings or tiwns or wild or tickets or football or baseball w/5 Dr. or doc\* or (last name)  
**[NOTE – IT IS THE COURT’S INTENTION THAT EACH WORD IN THE FIRST SERIES BE RUN AGAINST THE STRING IN THE SECOND SERIES]**
  - o. Slush or secret or market w/2 fund or money
  - p. Stark w/2 law
  - q. Improper w/5 payment or gift or price or quid or benefit or valu\*
3. The following words need not be searched at this time:
- a. Boat
  - b. Fly-in
  - c. Hangar 374
  - d. Premier Jet
  - e. 3242Z
  - f. Baron or Bravo
  - g. Excess\*
  - h. “kristan bowar”
  - i. [Bluesox19@aol.com](mailto:Bluesox19@aol.com)
  - j. Flight
  - k. Ski

This order is without prejudice to further requests by the United States or Relator for additional e-discovery.

Dated: February 13, 2019

s/David T. Schultz  
DAVID T. SCHULTZ  
United States Magistrate Judge